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January 28, 2010

State of California
Board of Equalization
450 N Street
Sacramento, California 95814

Document No. 11001008.1

Attention: Liz Houser
Deputy Director
Administration Department

Regarding: Limited Surface Particulate Composition Survey
1350 Front Street, San Diego, California

Dear Ms. Houser:

On January 10, 2010, industrial hygienists with Hygiene Technologies International, Inc. (HygieneTech) visited the property located at the above-referenced address for the purpose of conducting a limited surface particulate composition survey. The primary objective of the survey was to assess the presence or absence of combustion byproducts from non-solvent fuel sources—primarily char particles—on various interior surfaces of the second and the fifth floors of the building. Previously, HygieneTech was informed that the State of California Board of Equalization (BOE) employees in the building have expressed concerns regarding dust particles that have settled on various interior surfaces of the structure that were characterized as soot like. The analytical data, conclusions, recommendations, and a discussion of the recently recorded observations appear below. Note that the data provided in this report only represent the combustion byproduct deposits that existed at the sample locations indicated at the time of the survey.

The building was a five-story, concrete structure constructed on a concrete slab foundation, with a brick and concrete exterior, and a flat roof. The interior building materials included, but were not limited to, painted walls; painted ceiling or ceiling ceilings; vinyl baseboards; wood and/or metal doorjambs and door frames; and concrete subfloors with tile flooring or wall-to-wall carpeting in most of the general occupied areas. The building was not occupied at the time of the survey and typical office furnishings and equipment were observed throughout. At no time during the survey did HygieneTech detect odors characteristic of smoke/fire-damaged materials indoors or outside of the structure. Varying degrees of accumulated dust were observed on surfaces throughout the structure, with some surfaces showing visible quantities of particulate believed to potentially include char.

During the survey, composite “micro-vacuum” surface samples were collected for char analysis using 25-millimeter diameter, 0.8-micrometer pore size, mixed cellulose ester filters that were attached to a Gast brand high volume air-sampling pump. Analyses were performed using polarized light microscopy (PLM) and epi-Reflected Light Microscopy (RLM). All surface assessment data appear with supporting and background information in Table 11001008-5, which is included in Appendix A of this report. Note that the tabulated data represent carbon-based opaques that are likely associated with the incomplete combustion of wood and other botanicals, candles, rubber, and other non-solvent fuels, but they do not include carbon-based particulate that is associated with manufacturing or industrial processes, the latter of which was not expected to have been present at the site.

Note that under the most ordinary conditions, HygieneTech would expect to find some degree of char and other such combustion by-products in typical structures and, therefore, all samples—including those showing “none detected” results—likely contained, at a minimum, trace levels of carbonized material. Generally, results that are classified from less than one percent to one percent are considered *background* and unremarkable. All data greater than one percent to five percent combustion byproducts may be considered *above-background* and, depending on the observations recorded, may be considered potential evidence of settled particulate. And, combustion byproduct results ranging between five and 15 percent or more are considered both *above-background* and presumptive confirmation of the presence of settled particulate originating from a brushfire or similar events.

Based on the analytical data, HygieneTech believes that the following surfaces showed above-background levels of combustion byproducts that were potentially related to brushfire settled particulate:

- the cabinet located in Carrie Black’s office on the second floor;
- the windowsill in Rebecca Valdez’s office on the fifth floor;
- the cabinet located in Brian Kimsey’s office on the fifth floor; and
- the television located in Room 5026 on the fifth floor.

Note that while these results indicated that select surfaces showed above-background levels of settled particulate typical of combustion by-products from brushfires, they can not be attributed to a single event or source. It is likely that the settled particulate occurred over a period of time. Other potential sources may include char or ash from the use of residential fireplaces or the burning of wood/other botanicals in circumstance other than in a brushfire.

Based on the observations made at the time of the survey and the analytical data, HygieneTech recommends that the building interior horizontal surfaces be detailed cleaned using the appropriate methods during routine housekeeping activities.

Note that certain items required for regulatory compliance purposes, such as fire extinguishers, should be inspected and maintained as part of standard company procedures, and that that maintenance would include keeping fire extinguishers relatively free from settled particulate.

All data recorded do not represent conditions that are expected to pose a health hazard to persons above that posed by the outdoor environment. Note that the presence of the char and related combustion byproduct particulate identified in this report does not suggest that those materials in the subject structure having such deposits are hazardous and consequently the removal of such deposits does not constitute a hazardous waste operation.

If you have any comments or questions regarding the information contained in this correspondence, please feel free to contact our offices directly at (310) 370-8370.

Sincerely,

HYGIENE TECHNOLOGIES INTERNATIONAL, INC.

Kenny K. Hsi, CIH
Technical Director

HYGIENE TECHNOLOGIES INTERNATIONAL, INC.

APPENDIX A

CLIENT: State of California
Board of Equalization
450 N Street
Sacramento, California 95814

TABLE 11001008
SURFACE PARTICULATE COMPOSITION
1350 FRONT STREET
SAN DIEGO, CALIFORNIA
JANUARY 10, 2010

SAMPLE NUMBER	SAMPLING LOCATION	CARBONIZED MATERIAL (CHAR) CONCENTRATION	PARTICULATE ORIGIN	GENERAL IMPRESSION	ADDITIONAL COMMENTS
11001008-MV01	Second floor; southeastern cubical area; Carrie Black's cubicle; cabinet top; about center; from horizontal surface	**2 percent**	A, C	**Above-background**	N/A
11001008-MV02	Second floor; northeastern cubical area; Cathy Dillard's cubicle; cabinet top; about center; for horizontal surface	**1 percent**	A, C	**Background**	N/A
11001008-MV03	Second floor; northeastern cubicle area; by door 2022 tan shelf; top surface; about center; from horizontal surface	**1 percent**	A, C	**Background**	N/A
11001008-MV04	Fifth floor; registration cubicle area; Rebecca Valdez's office; windowsill; about center; from horizontal surface	**6 percent**	A, C	**Above-background**	N/A
11001008-MV05	Fifth floor; registration cubicle area; small desk by printer; right edge; about center; from horizontal surface	**1 percent**	A, C	**Background**	N/A
11001008- MV06	Fifth floor; collection cubicle area; Brian Kimsey's cubicle; cabinet top; about center; from horizontal surface	**8 percent**	A, C	**Above-background**	N/A
11001008- MV07	Fifth floor; room 5026; television top; about center; from horizontal surface	**4 percent**	A, C	**Above-background**	N/A
11001008- MV08	Blank	**ND**	N/A	N/A	N/A

LEGEND

N/A: Not Applicable
≤1%: Background
>1% to 5%: Above-background
>5%: Presumptive presence of brushfire-related particulate

ND: None detected (trace levels of carbonized material may be present in the sample below the laboratory analytical detection limit)
A: Particulate that is likely the result of incomplete combustion involving wood and other botanicals, candles, rubber, and other non-solvent fuels
B: Particulate that is likely the result of manufacturing or industrial processes
C: Wildfire residues typically containing carbonized material (char and ash) and black carbon (soot)